

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

RED RIVER TALC, LLC,¹

Debtor.

Chapter 11

Case No. 24-90505 (CML)

Related to Dkt. Nos. 805, 807, 808, 1424
and 1441

NOTICE OF APPEAL

Part I: Identify the Appellants

1. **Names of Appellants:** Brown Rudnick LLP (“Brown Rudnick”), Paul Hastings LLP (“Paul Hastings”), and FTI Consulting Inc. (“FTI”).

2. **Position of appellants in the bankruptcy case that is the subject of this appeal:**
Appellants Brown Rudnick and Paul Hastings are proposed counsel for the Official Committee of Talc Claimants (the “Committee”), and FTI is proposed financial advisor for the Committee.

Part II: Identify the Subject of this Appeal:

3. **Describe the judgment, order or decree appealed from:** Pursuant to 28 U.S.C. §§ 158(a)(1) and Rules 8001(a) and 8002(b)(1)(B) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Appellants hereby give notice of appeal to the United States District Court for the Southern District of Texas, solely to the extent each of this Court’s following orders precludes the Court from hearing and ruling on (a) the Committee’s pending applications to retain and employ Appellants Brown Rudnick, Paul Hastings and Susman Godfrey as counsel to the UCC and any fee applications pertaining thereto, and (b) the Committee’s pending application to retain and employ

¹ The last four digits of the debtor’s federal tax identification number are 8508. The Debtor’s mailing address is 501 George Street, New Brunswick, NJ 08933.

FTI as financial advisor to the Committee and any fee applications pertaining thereto: (i) the *Memorandum Decision and Order* [ECF No. 1424], entered March 30, 2025, dismissing the above-captioned case, and (ii) the *Order Denying Motions for Reconsideration and Motion to Order Mediation* [ECF No. 1441], entered April 17, 2025, denying the *Motion of the Official Committee of Talc Claimants and its Professionals for Limited Reconsideration or Clarification of Memorandum Decision and Order*.

4. **State the date on which the judgment, order, or decree was entered:** March 30, 2025; April 17, 2025.

Part 3: Identify the Other Parties to the Appeal:

5. **List the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys:**

[The remainder of this page is intentionally left blank]

PARTY	ATTORNEYS
Appellants: Proposed Professionals for the Official Committee of Talc Claimants	<p>BROWN RUDNICK LLP David J. Molton Jeffrey L. Jonas Eric R. Goodman Susan Sieger-Grimm Seven Times Square New York, NY 10036 Telephone: (212) 209-4800 dmolton@brownrudnick.com jjonas@brownrudnick.com egoodman@brownrudnick.com ssieger-grimm@brownrudnick.com</p> <p>PAUL HASTINGS LLP Kristopher M. Hansen Kenneth Pasquale Ryan Montefusco 200 Park Avenue New York, New York 10166 Telephone: (212) 318-6000 Facsimile: (212) 319-4090 krishansen@paulhastings.com kenpasquale@paulhastings.com ryanmontefusco@paulhastings.com</p> <p>Matthew M. Murphy 71 S. Wacker Drive, Suite 4500 Chicago, Illinois 60606 Telephone: (312) 499-6000 Facsimile: (312) 499-6100 mattmurphy@paulhastings.com</p> <p>COOLEY LLP Michael S. Neumeister 355 South Grand Avenue, Suite 900 Los Angeles, CA 90071-1560 Telephone: (213) 561-3250 mneumeister@cooley.com</p>

PARTY	ATTORNEYS
Interested Party: Red River Talc, LLC	<p>PORTER HEDGES LLP John F. Higgins M. Shane Johnson Megan Young-John James A. Keefe 1000 Main Street, 36th Floor Houston, Texas 77002 Telephone: (713) 226-6000 Facsimile: (713) 228-1331 jhiggins@porterhedges.com sjohnson@porterhedges.com myoung-john@porterhedges.com jkeefe@porterhedges.com</p> <p>JONES DAY Gregory M. Gordon Dan B. Prieto Amanda Rush 2727 N. Harwood Street Dallas, Texas 75201 Telephone: (214) 220-3939 Facsimile: (214) 969-5100 gmgordon@jonesday.com dbprieto@jonesday.com asrush@jonesday.com</p> <p>Brad B. Erens Caitlin K. Cahow 110 North Wacker Drive, Suite 4800 Chicago, Illinois 60606 Telephone: (312) 782-3939 Facsimile: (312) 782-8585 bberens@jonesday.com ccahow@jonesday.com</p>

PARTY	ATTORNEYS
Interested Party: Office of the United States Trustee	<p>Jayson B. Ruff 515 Rusk, Suite 3516 Houston, Texas 77002 (713) 718-4662 jayson.b.ruff@usdoj.gov</p> <p>Linda Richenderfer J. Caleb Boggs Federal Building 844 King Street, Suite 2207, Lockbox 35 Wilmington, Delaware 19801 (302) 573-6491 linda.richenderfer@usdoj.gov</p>
Interested Party: Claimants Represented by Barnes Law Group, LLC	<p>BARNES LAW GROUP, LLC Roy E. Barnes John R. Bevis 31 Atlanta Street Marietta, Georgia 30060 Telephone: (770) 227-6375 roy@barneslawgroup.com bevis@barneslawgroup.com</p>
Interested Party: Ad Hos Committee of Supporting Counsel	<p>PARKINS & RUBIO LLP Lenard M. Parkins Charles M. Rubio 700 Milam, Suite 1300 Houston, TX 77002 Telephone: (713) 715-1660 lparkins@parkinsrubio.com crubio@parkinsrubio.com</p>
Interested Party: Coalition of Counsel for Justice for Talc Claimants	<p>LAWSON & MOSHENBERG PLLC Nicholas R. Lawson Avi Moshenberg 801 Travis Street Suite 2101 #838 Houston, TX 77002 Telephone: (832) 280-5670 Nick.Lawson@lmbusinesslaw.com Avi.Moshenberg@lmbusinesslaw.com</p> <p>OTTERBOURG P.C. Melanie L. Cyganowski Adam C. Silverstein Sunni P. Beville David A. Castleman 230 Park Avenue New York, New York 10169-0075 (212) 661-9100 mycganowski@otterbourg.com asilverstein@otterbourg.com sbeville@otterbourg.com dcastleman@otterbourg.com</p>

PARTY	ATTORNEYS
	<p>BAILEY & GLASSER LLP Brian A. Glasser Thomas B. Bennett David L. Selby II Jonathan Gold 1055 Thomas Jefferson Street, NW Suite 540 Washington, DC 20007 Telephone: (202) 463-2101 Facsimile: (202) 463-2103 bglasser@baileyglasser.com tbennett@baileyglasser.com dselby@baileyglasser.com jgold@baileyglasser.com</p> <p>Katherine E Charonko 209 Capitol Street Charleston WV 25301 Tel: (304) 345-6555 Fax: (304) 342-1110 kcharonko@baileyglasser.com</p> <p>Elizabeth L. Stryker 94 Long Street Suite 200 Westover WV 26501 Tel: (304) 594-0087 estryker@baileyglasser.com</p>
Interested Party: The Smith Law Firm Claimants	<p>KRAMER LEVIN NAFTALIS & FRANKEL LLP Kenneth H. Eckstein Rachael L. Ringer P. Bradley O'Neill David E. Blabey, Jr. Megan M. Wasson 1177 Avenue of the Americas New York, New York 10036 Telephone: (212) 715-9100 Facsimile: (212) 715-8000 keckstein@kramerlevin.com rringer@kramerlevin.com boneill@kramerlevin.com dblabey@kramerlevin.com mwasson@kramerlevin.com</p> <p>LOCKE LORD LLP Elizabeth M. Guffy JPMorgan Chase Tower 600 Travis, Ste. 2800 Houston, TX 77002 Telephone: (713) 226-1507 Facsimile: (713) 223-3717 eguffy@lockelord.com</p>

Part 4: Not Applicable – No BAP in this District

Part 5: Signature

Dated: May 1, 2025

Respectfully submitted,

BROWN RUDNICK, LLP

/s/ Susan Sieger-Grimm

Susan Sieger-Grimm (Admitted *Pro Hac Vice*)

David J. Molton (Admitted *Pro Hac Vice*)

Jeffrey L. Jonas (Admitted *Pro Hac Vice*)

Eric R. Goodman (Admitted *Pro Hac Vice*)

Seven Times Square

New York, NY 10036

Telephone: (212) 209-4800

ssieger-grimm@brownrudnick.com

dmolton@brownrudnick.com

jjonas@brownrudnick.com

egoodman@brownrudnick.com

PAUL HASTINGS LLP

/s/ Kristopher M. Hansen

Kristopher M. Hansen (Admitted *Pro Hac Vice*)

Kenneth Pasquale (Admitted *Pro Hac Vice*)

Ryan Montefusco (Admitted *Pro Hac Vice*)

200 Park Avenue

New York, New York 10166

Telephone: (212) 318-6000

Facsimile: (212) 319-4090

krishansen@paulhastings.com

kenpasquale@paulhastings.com

ryanmontefusco@paulhastings.com

FTI CONSULTING INC.

BY: ROSENTHAL LAW FIRM, P.L.L.C.

/s/ Trent L. Rosenthal

Trent L. Rosenthal (TX Bar No. 17282300)
675 Bering Drive, Suite 150
Houston, TX 77057
Telephone: (713) 647-8177
Facsimile: (713) 647-8127
Email: troseenthal@rosenthallaw.com

-and-

COOLEY LLP

Michael S. Neumeister (*pro hac vice* pending)
355 South Grand Avenue, Suite 900
Los Angeles, CA 90071
Telephone: (213) 561-3250
Facsimile: (213) 561-3244
Email: mneumeister@cooley.com

Paul J. Springer (*pro hac vice* pending)
55 Hudson Yards
New York, NY 10001
Telephone: (212) 479-6000
Facsimile: (212) 479-6275
Email: pspringer@cooley.com

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served via the Court's ECF system to all parties authorized to receive electronic notice in this case, and by email upon the Master Service List (Dkt. No. 1392) on May 1, 2025.

/s/ Susan Sieger-Grimm

Susan Sieger-Grimm